

TAB "D"

EXCERPTS FROM ELEANOR AVERILL DEPOSITION

1 Q. Which is purchasing or buyer?

2 A. I'm in network services. I've had different
3 jobs.

4 Q. Ma'am, do you know an individual by the name of
5 Larry Meade?

6 A. Yes.

7 Q. All right. Have you ever had an incident with
8 Mr. Meade where he in any way had physical
9 contact with you?

10 A. Yes.

11 Q. When was that, ma'am?

12 A. The early 80s. I don't know the exact year.

13 Q. Okay. How well did you know Mr. Meade at that
14 time?

15 A. I did not.

16 Q. At all?

17 A. I'd seen him.

18 Q. Okay. Can you tell me what happened?

19 A. I was at the time working on the telephone system
20 for the company and I was in the phone room,
21 which is in the basement of the engineering
22 building, down a long dark hallway. And he came
23 into the room and I don't remember the
24 conversation he said to start off with and then
25 he pushed me up against the wall and tried to

1 kiss me. And I pushed him away and he said all
2 divorced women want it. And I just pushed him
3 away and left.

4 Q. Did you report this incident?

5 A. Yes, I did.

6 Q. Who did you report it to?

7 A. At the time my boss was Howard Horton and I
8 reported it to him.

9 Q. Were you interviewed by anybody in personnel,
10 human relations or anything about this?

11 A. No.

12 Q. Did anything happen to Mr. Meade about this?

13 A. I don't know.

14 Q. Did you ever discuss this -- you reported it to
15 Mr. Horton; is that correct?

16 A. Uh-huh.

17 Q. Did you ever discuss it with Mr. Horton
18 afterwards? In other words, what happened?

19 A. Yes.

20 Q. What did he tell you?

21 A. He told me -- when I told him about it, he told
22 me he would take care of it. Then he left and he
23 come back he told me that I was not to go down in
24 that room by myself again and that Mr. Meade was
25 supposed to stay away from me and to tell him if

1 he came near me. And I did not see him again for
2 multiple years.

3 Q. Okay. Was there any discipline that you're aware
4 of of Mr. Meade for what he did?

5 A. No.

6 Q. Okay. And you have not had any other contact
7 with Mr. Meade?

8 A. I have seen him occasionally at the vending
9 machines in the lunchroom.

10 Q. Did you have any conversation --

11 A. He said hello. I said hello and walked away.

12 Q. Okay. That's it? Have you ever seen him engage
13 in similar behavior with any other women?

14 A. No.

15 Q. Have you ever heard of him engaging in similar
16 behavior with other women?

17 A. Yes.

18 Q. Can you give us the circumstances of what you've
19 heard?

20 A. There were rumors. I didn't see it happen.

21 Q. That's all right.

22 A. I heard it from Valerie.

23 Q. Okay. How did you hear -- how did you find out
24 about --

25 A. She was working in the department the time and we

1 talked a lot and she was very upset with some of
2 his behavior.

3 Q. All right.

4 A. We were discussing it and I said well, who was
5 this? She told me and I said oh, well, he tried
6 that on me once like 30 years ago.

7 Q. All right.

8 A. And I had heard that Alma Matthews in engineering
9 had had problems, but I --

10 Q. What did you hear about Alma Matthews?

11 A. Somebody else was talking about it. I don't
12 remember who now.

13 Q. Do you have any idea --

14 A. Just that she had had problems with him.

15 Q. All right. Anybody else?

16 A. One of my personal friends had gone to high
17 school with him had told me that he had tried to
18 force himself on her, but --

19 Q. What's her name?

20 A. Her name's Diana Ace (ph). She lives in Phoenix,
21 Arizona; Glendale, Arizona.

22 Q. Okay. Did he try to force himself on her in high
23 school or in the plant?

24 A. I believe in high school.

25 Q. Okay. Any other women that you know of?

1 A. No.

2 Q. Have you heard any -- you were interviewed -- or
3 were you interviewed by people in human relations
4 since the incident? And I'm talking about --

5 A. Since which incident?

6 Q. The incident involving Mr. Horton -- well, I
7 guess we should say since the Valerie Wakefield
8 incident, have you been interviewed?

9 A. Just the ladies here.

10 Q. That's it?

11 A. Uh-huh. Diane Kemick was in that too; wasn't
12 she? I can't remember.

13

14 MS. COCHENOUR: You can't ask me.

15 THE WITNESS: Oh, I'm sorry.

16 MS. COCHENOUR: You have to answer
17 from your memory.

18

19 A. I have discussed it with legal, yes.

20 Q. All right. But that's all?

21 A. Uh-huh.

22 Q. Okay. When was that discussion?

23 A. Earlier this year.

24 Q. Here's a -- maybe mark this as Exhibit 1.

25